

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA

TIMOTHY S. THERRIEN,	)	
an individual,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 06CV 217 JHP-FHM
	)	
TARGET CORPORATION,	)	
a Minnesota corporation,	)	
	)	
Defendant.	)	

**WITNESS LIST OF DEFENDANT TARGET CORPORATION**

COMES NOW Target Corporation (“Target”), Defendant herein, and pursuant to the Court’s Scheduling Order does submit its list of those individuals it may call as witnesses at the trial of this cause. By including within this list of witnesses certain individuals who may offer testimony regarding its security or training procedures, Target does not herein waive its objections to the admissibility of that or any other evidence.

**WITNESSES**

<b>Witness</b>	<b>Proposed Testimony</b>
Michael Brewer Target Corporation c/o Richards & Connor	Training and security procedures of Target Corporation.
Corporal Brian Collumn Tulsa Police Department	Observations of scene of incident and interviews of witnesses, observations of Target Store security.
Deputy Michael Carter Creek County Sheriff’s Office	Plaintiff’s history of violence, arrests and incarceration.
Jimmy Crow Current address unknown	Plaintiff’s psychiatric history and history of violent behavior (per Protective Orders).

Maclyn Crow  
Current address unknown

Plaintiff's psychiatric history and history of violent behavior (per Protective Orders).

Officer Steve Downey  
Tulsa Police Department

Observations of scene of incident and interviews of witnesses, statements of Plaintiff.

Officer Connie Evans  
Tulsa Police Department

Observations of scene of incident and interviews of witnesses, statements of Pavey, observations of Target Store security and of Pavey.

Sandy Files  
Target Corporation (retired)  
c/o Richards & Connor

Observations of scene of incident, statements of Pavey concerning incident.

Dwayne Grant  
Target Corporation  
c/o Richards & Connor

Statement of Pavey at scene that he told Therrien to stay back from the altercation.

Teresa Johnson  
Former Target Corporation employee  
c/o Richards & Connor

Statement of Kreps that instructed Plaintiff not to go to the area of the altercation.

Greg Kinslow  
Former Target Corporation employee  
c/o Richards & Connor

Experience as Target security employee, observations of scene of incident and assistance of police at scene, experience with Pavey, Target security and training procedures.

Lisa Boughman Kreps  
Target Corporation  
c/o Richards & Connor

Observations of incident and instructions to Therrien to stay away from the altercation, statement of Pavey to Therrien to "back off".

Dr. Luke  
Veterans Administration  
Tulsa, Oklahoma

Psychiatric history of Plaintiff, treatment of Plaintiff.

Scott Manley  
Sensormatic Corporation  
Tulsa, Oklahoma

Repair to CCTV camera system on day of incident and observations of scene of incident.

David Pickel  
Target Corporation  
c/o Richards & Connor

Observations of scene of incident, statements of Plaintiff.

Julie Plonczynski  
Target Corporation  
c/o Richards & Connor

Events leading to incident and observations of scene of incident, observations and experience with Pavey as an Asset Protection employee of Defendant Target Corporation, experience as Target Asset Protection employee and supervisor, statements of Plaintiff and Plaintiff's daughter, return of Therrien to store after incident, Target security procedures and training.

Stacie Pavey  
Target Corporation  
c/o Richards & Connor

Training and procedures of Target Corporation, events leading to incident and occurrence of incident, employment with Target, statements of Plaintiff.

Jessica Therrien  
Current address unknown

Plaintiff's history, injuries from subject incident, statements regarding incident.

Kim Therrien  
Current address unknown

Plaintiff's history of violence and psychiatric history, and events preceding incident at Target.

Timothy Therrien  
Plaintiff  
c/o Dorwart Law Firm

Personal history, incident in issue, injuries, medical and psychiatric history, prior history of violence.

Dr. David Traub  
Heritage Medical Clinic  
Tulsa, Oklahoma

Plaintiff's history of severe post-traumatic stress disorder with violent tendencies, prior medical history, injuries from subject incident and treatment thereof.

Sergeant Mark Watson  
Tulsa Police Department

Observations of scene of incident, experience responding to calls at subject Target Store.

Expert witnesses to be identified

Witnesses identified by Plaintiff and not otherwise objected to.

As discovery is ongoing, Target may seek to supplement this list with additional witnesses.

WHEREFORE, premises considered, Defendant Target Corporation submits the foregoing as its list of those witnesses whom it may call at the trial of this cause.

Respectfully submitted,

s/ Jason L. Glass

Phil R. Richards, OBA #10457

Jason L. Glass, OBA #17635

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ATTORNEYS FOR DEFENDANT  
TARGET CORPORATION

### **CERTIFICATE OF MAILING**

**X** I hereby certify that on December 18, 2007, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the following ECF registrants:

Paul DeMuro, Esq.

Eric R. Schelin, Esq.

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*Attorney for Plaintiff*

s/ Jason L. Glass

Jason L. Glass